

FILED
8/23/2022
SH
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

No. 21 CR 316

v.

Violation: Title 18, United States Code,
Section 2252A(a)(5)(B)

MATTHEW SCHWARTZ

Superseding Information

The UNITED STATES ATTORNEY charges:

JUDGE WOOD
MAGISTRATE JUDGE WEISMAN

On or about May 24, 2021, at Inverness, in the Northern District of Illinois,
Eastern Division, and elsewhere,

MATTHEW SCHWARTZ,

defendant herein, knowingly possessed material, namely, a SanDisk USB thumb drive that contained an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), involving a minor, such image having been shipped and transported using any means and facility of interstate and foreign commerce, and such image having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

The UNITED STATES ATTORNEY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A as set forth in this Superseding Information, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to the following specific property: a SanDisk USB thumb drive seized on May 24, 2021.

Signed by Erika Csicsila on behalf of the
UNITED STATES ATTORNEY